

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAVID LANE JOHNSON,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE  
PLAYERS ASSOCIATION, ET AL.,

Defendants.

Civil Action No. 1:17-cv-05131-RJS

**DECLARATION OF DAVID L. GREENSPAN**

I, **DAVID L. GREENSPAN**, declare as follows:

1. I am a partner at Winston & Strawn LLP, and counsel for the National Football League Players Association (“NFLPA”) in the above-captioned action. I make this declaration in support of the NFLPA’s Motion for Summary Judgment, submitted herewith. If called upon to do so, I will testify competently to the facts set forth herein.

2. Attached as **Exhibits A-1 through A-8** is a true and correct copy of an email from myself to S. Zashin, with attachments, dated October 16, 2018. The email and attached letter are attached as Exhibit A-1, and the other attachments to the email are attached as Exhibits A-2 through A-8. I sent this email and its attachments to counsel for Plaintiff David Lane Johnson (“Plaintiff”) in my capacity as counsel of record for the NFLPA in the above captioned matter.<sup>1</sup>

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<sup>1</sup> This email and its attachments were divided into eight exhibits in order to comply with Rule 2(H) of this Court’s Individual Rules and Practices.

3. Attached as **Exhibit B** is a true and correct copy of an email from S. Zashin to myself dated Oct. 17, 2018. I received this email from counsel to Plaintiff in my capacity as counsel of record for the NFLPA in the above captioned matter.

4. Attached as **Exhibit C** is a true and correct copy of an excerpt from the 2011 Collective Bargaining Agreement between the NFLPA and the National Football League Management Council (“NFLMC”), as amended in 2015.

5. Attached as **Exhibit D** is a true and correct copy of the March 9, 1998 arbitral award in the *Wally Williams* matter issued by Special Master Jack H. Friedenthal.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection. Executed this 9<sup>th</sup> day of November 2018 at New York, New York.

/s/ David L. Greenspan  
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